

ROBERT M. DRASKOVICH, ESQ.  
Nevada Bar No. 6275  
815 South Casino Center Blvd.  
Las Vegas, Nevada 89101-6718  
702-474-4222  
[emagana@draskovich.com](mailto:emagana@draskovich.com)  
[robert@draskovich.com](mailto:robert@draskovich.com)  
Attorney for Defendant

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	Case No.: 2:19-CR-00300-JCM-EJY
Plaintiff,	)	
	)	
	)	<b><u>STIPULATION TO CONTINUE</u></b>
vs.	)	<b><u>SENTENCING HEARING</u></b>
	)	<b>(Third Request)</b>
	)	
	)	
JORGE SAENZ DE TEJADA,	)	
Defendant.	)	
	)	

IT IS HEREBY STIPULATED AND AGREED by and between, Robert M. Draskovich, Esq., attorney for Defendant, Jorge Saenz De Tejada, and Christopher Chiou, United States Attorney, District of Nevada, Simon F. Kung, Assistant United States Attorney, that the sentencing hearing in the above captioned case, which is currently scheduled for August 4, 2021 at 10:30AM., be continued and reset to a date and time convenient to the Court, but no sooner than ninety (90) days.

The Stipulation is being entered for the following reasons:

1. Based on the public health emergency brought by the COVID-19 pandemic, and the required social-distancing measures as recognized in the Court's Temporary General order 2020-05 Extended, the parties agree to continue the currently scheduled sentencing hearing from August 4, 2021 at 10:30AM., to a date and time convenient to the Court, but no sooner than ninety (90) days.
2. This continuance allows counsel additional time to prepare for the hearing.

1 3. This continuance is not sought for purposes of delay, but to account for the necessary  
2 social-distancing in light of COVID-19 public health emergency.

3 4. The defendant is out of custody and does not object to the continuance.

4 RESPECTFULLY SUBMITTED this 28<sup>th</sup> day of July, 2021.

5  
6 /s/ Simon F. Kung  
SIMON F. KUNG  
Assistant United States Attorney  
7 Attorney for Plaintiff

8 /s/ Robert M. Draskovich  
ROBERT M. DRASKOVICH, ESQ.  
9 Nevada Bar No. 6275  
Attorney for Defendant  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA, ) Case No.: 2:19-CR-00300-JCM-EJY  
4 )  
5 Plaintiff, )  
6 vs. ) **Findings and Order on Stipulation**  
7 )  
8 JORGE SAENZ DE TEJADA, )  
9 Defendant. )  
10 )  
11 )  
12 )  
13 )  
14 )  
15 )  
16 )  
17 )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )

Based on the pending stipulation between the government and the defense, and good cause appearing therefore, the Court hereby finds that:

1. To account for the necessary social-distancing in light of the COVID-19 public health emergency, the sentencing hearing in this case should be continued.
2. The parties agree to this continuance.
3. This continuance allows counsel additional time to prepare for the hearing.
4. This continuance is not sought for purposes of delay.

**ORDER**

**IT IS THEREFORE ORDERED** that the sentencing hearing in the above-captioned matter currently scheduled for August 4, 2021 at 10:30AM., be vacated and continued to a date and time convenient to this Court, that is November 10, 2021 at the hour of 10:00 AM.

**IT IS SO ORDERED** July 29, 2021.

22   
23 UNITED STATES DISTRICT JUDGE